

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of

Policies and Rules Concerning  
Unauthorized Changes of  
Consumers' Long Distance  
Carriers

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CC Docket No. 94-129

**COMMENTS OF SBC COMMUNICATIONS INC.**

SBC Communications Inc., on its behalf and on behalf of its wireline subsidiaries, (collectively referenced as "SBC") appreciates the Commission's continued investigation into the shared use of carrier identification codes (CICs) by facilities-based carriers and switchless resellers. As stated in its earlier Comments,<sup>1</sup> SBC strongly believes that requiring resellers to obtain their own CICs will hasten the exhaust of this limited commodity. The expense to the industry of this exhaustion cannot be lightly dismissed. By analogy, the cost of converting from a 3-digit CIC to a 4-digit CIC nationwide is estimated to have been approximately \$1.1 billion.

Nor is this action necessary since the use of another form of nationwide carrier registration system, similar to that employed by the Commission Registration system would address the Commission's concerns without significant disruption. SBC in this proceeding and in its Comments filed in relation to the Truth and Billing proceeding<sup>2</sup> has proposed a nationwide carrier registration system. A national registry could be established with an annual registration

<sup>1</sup> Comments of SBC Communications Inc., In the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996 and the Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, CC Docket No. 94-129, pp. 5-10.

<sup>2</sup> Comments of SBC Communications Inc., In the Matter of Truth-In-Billing, CC Docket No. 98-170 filed November 13, 1998.

Comments of  
SBC Communications, Inc.

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fee to cover administrative costs. An administrator could assign unique codes to each service provider for purposes of carrier identification and reporting. Those carriers with existing CICs could use those same numbers. This system would eliminate the anonymity that shields some resellers from responsibility for their actions and would help reduce customer confusion as to the specific provider involved in any given transaction. The use of this ancillary system also allows the CICs to be used for the purpose for which they are intended, the routing of designated calls. To assist the Commission in its determination as to the proper method for identifying switchless resellers, SBC submits the following supplemental information.

**I. What would it cost resellers to purchase translations access alone, as distinguished from Feature Group D access, and should the Commission require that this functionality be offered separately ?**

Industry guidelines<sup>3</sup> do not presently permit the assignment of CICs for Feature Group D (FG-D) translation access to be offered separately from trunk access. Moreover, SBC does not offer FG-D translation access separately and would oppose any requirement that it do so. Such separation would infringe upon the relationship of an underlying carrier and its reseller. It would impair the ability of carriers to predict and plan for the volume of traffic carried by their network and thus, could also adversely impact customer service. Even if the Commission were to require the assignment of CICs to switchless resellers, the direction and authorization for the routing of the traffic must come from the underlying carrier which has trunk access.

It is possible in SBC territory for a switchless reseller to obtain a CIC without directly obtaining FG-D trunk access, provided the reseller's underlying carrier has FG-D trunk access with an SS 7 network and the underlying carrier subscribes to SBC's Carrier Identification Parameter (CIP). CIP is an enhancement to FG-D which enables the transmission of the CIC on

each call to be sent to subscribing FG-D customers. CIP is designed to allow the call set-up protocol to carry the CICs of multiple carriers through the originating network and subsequent networks.

As to the cost to the switchless reseller, the underlying carrier on behalf of the reseller may request a CIC assignment from the North American Numbering Policy Administrator; there is no charge for this assignment. The underlying carrier must subscribe to CIP and presumably will pass this cost on to its resellers. The reseller would then be directly responsible for a set-up fee and monthly charge per switch.

**II. Is there a functionally equivalent service that in conjunction with elimination of the current NANPA requirement that carriers must purchase Feature Group D to obtain a CIC, would make it possible for switchless resellers to use CICs without also purchasing translations service directly? Should the Commission require the purchase of such service by underlying carriers and to what extent are underlying carriers already purchasing this service? What are the drawbacks to this approach?**

SBC does not offer a functionally equivalent service of the type apparently envisioned by the Commission. Even if the Commission were to administratively separate the purchase of translation access from FG-D trunk access, it cannot separate the functionality of CIC routing from FG-D trunk access. The purchase of FG-D is essential to the usage of CICs since the purpose for CICs is to route traffic via FG-D trunks. The assignment of a CIC for purposes other than routing is a grossly inefficient use of a limited resource. The CIP feature discussed above permits more than one CIC to be carried on an SS 7, FG-D trunk group. The underlying carrier must still issue a translation order to the local exchange carrier to activate an additional CIC on the trunk group. This feature is currently available in California, the five states served by Southwestern Bell Telephone Company and the five states served by the Ameritech local

exchange companies. Requiring all carriers to purchase CIP, however, is unwarranted since there is no evidence that all underlying carriers need to point multiple resellers to their FG-D service.

**III. What modifications to the network, OSS and other systems will underlying carriers and LECs have to make to accommodate the use of switchless reseller CICs? What would be the cost of such modifications and the time required to carry them out?**

As discussed above, subject to CIC exhaustion and current switch limitations, it is possible to assign CICs to resellers of carriers with FG-D service. Currently switches deployed in SBC territory are limited in the number of CICs that can be provisioned. For example, in relation to a Nortel DMS100 switch only 999 CICs can be translated; for a Nortel DMS10 switch, 255 CICs can be translated; for a Lucent 5ESS switch, 10,000 CICs can be translated and; for a Lucent 1AESS switch, 1000 CICs can be translated.<sup>4</sup> These switches have been engineered based on the assumption that not all carriers will have a presence in all areas. If switchless carriers were assigned CICs, the switch translation tables would quickly reach their limit. Vendor development will be required to expand these translation tables. The costs of such activity cannot be estimated with any accuracy by SBC. It is anticipated that availability of this technology will take a minimum of 12 months from the date of the vendor request plus an additional 18 months for SBC to test and load the feature in its switches.

**IV. Would the proposed CIC requirements be affordable for switchless resellers? Are there specific measures that would mitigate the costs to these resellers? Would there be competitive benefits or disadvantages for resellers?**

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<sup>4</sup> Since Lucent Technologies has announced that 1AESS switches are “manufacturer discontinued”, 1AESS switches cannot be expanded beyond their current CIC capacity.

SBC does not have adequate information on which to comment as to the affordability of CIC requirements from the standpoint of resellers. There is no cost to receive a CIC assignment from NANPA. The switchless reseller would simply place a translation order with the underlying carrier.

As to the competitive advantages/disadvantages, if the Commission were to assign CICs to switchless resellers, facilities-based local exchange carriers would be placed in the position of being required to make costly upgrades to their switches without any benefit or apparent means of recovery. Meanwhile, the switchless resellers, whose intentional activity in slamming other resellers' customers is the basis for the Commission taking this action, would bear none of the financial burden. This action by the Commission would violate the guideline of competitive neutrality and would "penalize" facilities-based carriers in the competitive marketplace.

**V. What are the dimensions of soft slamming and the associated carrier identification problems? What is the percentage of slamming complaints that involve soft slams and the percentage that involve consumers whose preferred carrier freeze protections have been bypassed?**

As the Commission has recognized, the absence of any unique identifier for switchless resellers potentially distorts the number of slams properly assignable to activity on the part of the underlying carrier. It also makes it impossible to electronically track the practices of an individual reseller. For these reasons, SBC does not have accurate information as to the percentage of soft slams in comparison to other slamming activity or the percentage of soft slams that involve preferred carrier freeze protections. If a switchless reseller slams another reseller utilizing the same underlying carrier, or even slams the underlying carrier itself, the slam is not readily apparent.

SBC endorses the Commission's goal of identifying the carrier actually responsible for a slam. However, it strongly opposes the use of CICs, which are employed in routing, as this carrier identifier. To do so depletes an already limited commodity, which in turn will result in a significant cost to facilities-based providers in money and other resources. Nor is this harm outweighed by the benefit, since it is within the Commission's authority to adopt another means of carrier identification without the negative impact on facilities-based providers.

**VI. Does this proposal create a significant risk of CIC exhaustion and are modifications to the existing Commission policy restricting CIC assignments necessary to accommodate the assignment of CICs to resellers.**

Clearly, CICs are a limited commodity and any heightened demand for CICs hasten the exhaustion of their numbers. Moreover, although the recent expansion to 4-digit CICs increased the number of assignable CICs to 9,999, most switches are limited in capacity to 1000 CICs. Moreover, given current conservation policies, it is likely that a demand already exists from facilities-based carriers for the assignment of CICs for routing purposes. To add to this demand the CICs which would be required for all switchless resellers would unnecessarily deplete this resource.

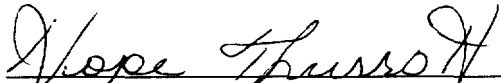
The exhaustion of 4-digit CICs , by necessity, will lead to 5-digit expansion. As the Commission recalls, the conversion to 4-digit CICs was a long, arduous process and required an expenditure for the industry of more than \$1 billion. In addition to monetary expenditures were the countless hours spent by employees making the necessary software and OSS modifications. To now adopt a measure which would again result in this activity and expenditure within only a few years of the last conversion effort is unwarranted and unjustified given the alternatives available to the Commission.

## CONCLUSION

While the Commission has a valid concern in seeking to identify switchless resellers guilty of slamming practices, this objective can be accomplished through the adoption of a carrier identification system limited to this purpose. To distort the CIC assignment process in this manner would hasten the exhaust of a resource necessary for routing purposes. SBC strongly urges the Commission to carefully assess the alternatives available in order to adopt a system which poses the least disruption and expense.

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June 13, 2000

Certificate of Service

On this 13<sup>th</sup> day of June, 2000, I, Regina Ragucci, hereby certify that the comments of SBC Communications, Inc. in CC Docket No. 94-129 have been served upon the parties listed in the Service List attached.

  
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